



THE CITY OF NEW YORK
LAW DEPARTMENT

GEORGIA PESTANA
Corporation Counsel

100 CHURCH STREET
NEW YORK, NY 10007

Maria Fernanda DeCastro
Labor and Employment Law Division
phone: (212) 356-2658
fax: (212) 356-2439
email: mdecastr@law.nyc.gov

November 22, 2021

Via ECF

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Carol Hasday v. City of N.Y. et al., 19-CV-10239 (LAP)

Dear Judge Preska:

I am a Senior Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York, attorney for defendants City of New York and Sherry S. Chan in the above-referenced matter. I write respectfully to request a two-week extension of time to submit the parties' joint discovery dispute letter, from November 22, 2021, to December 6, 2021. This request is submitted with plaintiff's consent. The parties have also agreed that depositions of plaintiff Hasday, defendant Chan, and one additional witness specified by plaintiff will take place during the period January 10 through January 28, 2022, with the deposition of plaintiff Hasday taking place on January 12, 2022, the deposition of defendant Chan taking place on January 7, 2022, and the deposition of Michael Samet, an employee of defendant City, taking place on January 17, 2022.

This request is being made to allow the parties to continue discussing issues identified with the discovery that has been exchanged thus far. Additionally, I have been on trial in the matter of Bilitch v. H+H, et al., Index No. 17238/2011, which, unfortunately, left me with no time last week to look into the discovery issues raised by plaintiff's counsel on Wednesday of last week.¹ This additional time will allow the parties to try to resolve some, if not all, discovery disputes without having to raise these issues with the Court.

As such, I respectfully request that the Court extend the deadline for the parties to submit a joint discovery dispute letter until December 6, 2021.

SO ORDERED.

Dated: November 22, 2021
New York, New York

LORETTA A. PRESKA

Senior United States District Judge

¹ The Bilitch matter settled this morning in front Judge Genine Edwards.

I thank the Court for its attention to this matter.

Respectfully submitted,
/s/
Maria Fernanda DeCastro
Senior Counsel

CC: **By ECF**

John Beranbaum, Esq.
Hilary Orzick, Esq.
Crumiller P.C.
Attorneys for Plaintiff Carol Hasday
16 Court Street, Suite 2500
Brooklyn, New York 11241